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# **Texas Department of Health**

## **Health Insurance Portability and Accountability Act (HIPAA)**

### **HIPAA Communication Plan** Version 1.0

**July 20, 2001**



## **Executive Summary**

TDH Enterprise Systems HIPAA Project developed this Communication Plan ('Plan') based on the communication requirements of the Texas Department of Health Program stakeholders. The Plan encompasses audiences that are both internal and external to the HIPAA project. This Plan describes the structured, formal communication process within TDH for the HIPAA Project. Enterprise Systems recognizes that other communication methods exist that is informal and more generic. Although these items have not been specifically identified in the Plan, the Project will also use these more informal communication mechanisms. These include, but are not limited to, electronic mail, memorandums, and telephone conversations.

There are six sections in the Plan. The first section contains a brief overview of the HIPAA project and the second outlines the purpose of the Plan. The third section describes the means of communication for the Project. The fourth section, Communication Items, describes each communication item, provides the purpose of the item, the template or standard the item will be based on, and where the item will be located. The Communication Matrix in the fifth section lists each Item, the audience that will receive the communication, how frequently the item will be communicated, the medium used to provide/create the item, and the person who will provide/create the item. The last section, the Communication Map, provides a visual representation of the interaction between the Project and each audience.

Communication items will be available via the TDH HIPAA Project Web Site providing total communication to all audiences, anytime, from anywhere. The timing and all content will be subject to approval by TDH Enterprise Systems prior to publication, if necessary.

## 1. HIPAA Project Overview

The HIPAA requirements outlined by the law and the regulations promulgated by DHHS are far-reaching. HIPAA mandates the implementation of administrative and technical rules (standards) for the electronic exchange and maintenance of health information, including: electronic transaction standards, standard code sets for information, unique health identifiers for employers and providers, security and digital signatures, and privacy of individually identifiable health information. There are legal, regulatory, process, security, and technology aspects to each proposed rule that must be carefully evaluated prior to implementation.

## 2. Purpose

### 2.1. Purpose of the Communication Plan

Due to the extensive effects that HIPAA will have on a multitude of state agency programs, the need for an effective communication infrastructure is critical. The Texas Department of Health (TDH) Enterprise Systems developed this Communication Plan ('Plan') based on the communication requirements of the TDH Program stakeholders. The Plan is based on a view from the project management level, encompassing audiences that are both internal and external to the HIPAA project.

#### 2.1.1. Goals of Internal Communication

The goals of internal communication are to:

- Communicate complex and ever-changing information to a broad variety of project stakeholders clearly and at the appropriate level of detail
- Ensure that information flows efficiently and effectively to and from all project stakeholders
- Promote project accountability
- Provide written documentation of project issues, decisions, and milestones
- Ensure the creation and maintenance of effective communication structures in order to keep stakeholders well-informed

#### 2.1.2. Goals of External Communication

The goals of external communication are to:

- Provide information about HIPAA to a wide variety of audiences in order to expand awareness and understanding of the impact HIPAA will have on Medicaid systems and business processes
- Prevent redundant work by creating and maintaining a core set of materials that can be used to communicate information about HIPAA to a broad range of audiences

## 3. Communication Mechanisms

### 3.1. The Internet and the Intranet

#### 3.1.1. HIPAA Project Web Site

The HHSC HIPAA project website is located at:

<http://www.hhsc.state.tx.us/NDIS/NDISTaskForce.html>.

The TDH HIPAA website is located on TDH Online at: <http://tdh-online/hipaa/default.htm>

These websites provide a powerful tool for sharing information among all stakeholders. It currently contains information about the project, offers links to Federal and other related websites, and provides the email address for questions from users. Questions received and answers given will be posted and maintained on the website. Project personnel can post new documents and update existing information as often as needed, offering stakeholders with internet access a convenient, easy way to share information.

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### 3.1.2. HHSC HIPAA Project Extra-Net Site

The HHSC HIPAA project extra-net website will be established to provide a place to share information among the PMO, the state agency project managers, and the interagency workgroups. Information such as project plans and status reports that need to be shared among state agency personnel, but may not be appropriate for the public access provided by the website, can be shared on the extranet

### 3.1.3. External Websites

HCFA offers extensive information about the HIPAA project on its website located at:

<http://www.hcfa.gov/medicaid/hipaa>

HCFA uses its website to publish HIPAA rules, regulations, and standards. Other national workgroups (for example the WEDI, NMEH, NUBC, and NUCC) are currently working on HIPAA issues and publish information about their work. The HCFA website also gives links to related websites such as the WEDI and NMEH workgroup sites.

### 3.2 Meetings/TDH Newsletters/BlueBoards/KIOSKs

TDH will communicate and provide HIPAA information and updates to all stakeholders through these mediums.

### 3.3 Conferences

HCFA regularly holds HIPAA conferences to bring states together to share information about the status of HIPAA implementation across the country. National organizations, for example the ANSI X12N Standards Board, WEDI, and many others, hold national conferences to share information and provide forums for discussion and resolution of issues. This information will be shared with TDH staff as appropriate.

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#### 4. Communication Items

The following tables contain a description of each communication item, provides the purpose of the item, the template or standard that the item will be based on, and where the item will be located.

ID:	1
Communication Item:	Meeting Agenda <ul style="list-style-type: none"><li>• HHSC HIPAA Meetings</li><li>• TDH HIPAA Meetings</li></ul>
Description:	This a document that contains the agenda or list of discussion items for a future meeting.
Purpose:	To inform participating members of the date, time location, purpose, and agenda for an upcoming meeting.
Template or Standards:	Meeting Agenda and Minutes
Location:	HHSC HIPAA Extranet Site for HHSC HIPAA Meetings; TDH Online and/or Blue Board for TDH HIPAA Meetings

ID:	2
Communication Item:	Meeting Minutes <ul style="list-style-type: none"><li>• HHSC HIPAA Meeting Minutes</li><li>• TDH HIPAA Meeting Minutes</li></ul>
Description:	This is a document that contains the minutes and action items of discussions during a meeting.
Purpose:	To share information with attendees, provide historical reference of past discussions, and to track action items.
Template or Standards:	Meeting Agenda and Minutes
Location:	HHSC HIPAA Extranet Site for HHSC HIPAA meeting minutes; Email distribution to attendees on TDH HIPAA meeting minutes

ID:	3
Communication Item:	Bi - Weekly Status Reports for HHSC HIPAA PMO Updates and TDH Management
Description:	This document produced bi-weekly contains written update of activities and accomplishments for HHSC HIPAA PMO Updates.
Purpose:	To review actual versus baseline status of all tasks and Project Management processes. This report facilitates project communication and risk control.
Template or Standards:	Bi-Weekly Status Report
Location:	HHSC HIPAA Extranet Site; Report copy given to TDH HIPAA Project Director and Associate Commissioner for Information Services

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ID:	4
Communication Item:	HHSC PMO Project Monthly Updates*
Description:	A newsletter published on the project website for external audiences, this document will provide news about the project.
Purpose:	To keep external stakeholders updated about current project activities and accomplishments.
Template or Standards:	HHSC HIPAA PMO Update
Location:	HHSC HIPAA Project Website

ID:	5
Communication Item:	HHSC Executive Steering Committee Agenda*
Description:	This document contains the agenda or list of discussion items for an Executive Steering Committee meeting.
Purpose:	To inform participating project stakeholders of the date, time, location, purpose, and discussion items for an upcoming Executive Steering Committee meeting.
Template or Standards:	Executive Steering Committee Agenda
Location:	HHSC HIPAA Project Extranet Site

ID:	6
Communication Item:	HHSC Executive Steering Committee Meeting Minutes*
Description:	This document contains the minutes and action items of discussion for an Executive Steering Committee meeting.
Purpose:	To share information with non-participating project stakeholders, provide historical reference of past discussions, and track action items.
Template or Standards:	Executive Steering Committee Meeting Minutes
Location:	HHSC HIPAA Project Extranet Site

ID:	7
Communication Item:	HIPAA Advance Planning Document (APD) and Approval Letter*
Description:	APD is a document mandated by HCFA that include a feasibility study, a cost-benefit analysis, and an implementation plan. The Approval Letter is the official correspondence from HCFA providing federal funding approval for the project.
Purpose:	Grant federal funding approval
Template or Standards:	Federal APD guidelines and standards
Location:	HHSC HIPAA Project Extranet Site

\* Indicates prepared by HHSC PMO with TDH input.

ID:	8
Communication Item:	HIPAA Project Charter <ul style="list-style-type: none"> <li>• HHSC Project Charter</li> <li>• TDH Project Charter</li> </ul>
Description:	A high level document that describes the project goals, objectives and deliverables.
Purpose:	Provides the project manager with the authority to apply organizational resources to project activities.
Template or Standards:	Project Charter
Location:	HHSC HIPAA Project Extranet Site; TDH Online – HIPAA Project Website

ID:	9
Communication Item:	HIPAA Project Management Plan <ul style="list-style-type: none"> <li>• HHSC HIPAA Project Management Plan</li> <li>• TDH HIPAA Project Management Plan</li> </ul>
Description:	A formal, approved document used to guide both project execution and project control.
Purpose:	To document planning assumptions and decisions, to facilitate communication among stakeholders, and to document approved scope, cost, and schedule baselines.
Template or Standards:	Project Management Plan
Location:	HHSC HIPAA Project Extranet Site TDH Online – HIPAA Project Website

ID:	10
Communication Item:	HIPAA Project Development Plan <ul style="list-style-type: none"> <li>• HHSC HIPAA Project Development Plan</li> <li>• TDH HIPAA Project Development Plan</li> </ul>
Description:	A formal, approved document used to guide both project execution and project control of information technology (IT) remediation.
Purpose:	To document planning assumptions and decisions, to facilitate communication among stakeholders, and to document approved scope, cost, and schedule baselines for IT remediation.
Template or Standards:	Project Development Plan
Location:	HHSC HIPAA Project Extranet Site TDH Online – HIPAA Project Website

ID:	11
Communication Item:	HIPAA Work Breakdown Structure & Activities List/Schedule <ul style="list-style-type: none"> <li>• HHSC HIPAA Work Breakdown Structure</li> <li>• TDH HIPAA Work Breakdown Structure</li> </ul>
Description:	A deliverable-oriented grouping of project elements that organizes and defines the total scope of the project. Each descending level represents an increasingly detailed definition of a project component.
Purpose:	To track the progress of tasks and deliverables.
Template or Standards:	Work Breakdown Structure Template
Location:	HHSC HIPAA Project Extranet Site TDH Online – HIPAA Project Workspace

ID:	12
Communication Item:	HIPAA Issue Tracking Log <ul style="list-style-type: none"> <li>• HHSC issue tracking log</li> <li>• TDH issue tracking log</li> </ul>
Description:	As an issue is identified, it will be described, given a tracking number, and a person will be assigned as the contact point. Progress toward the issue's resolution will be documented. Status of the issue (open, on-hold, closed) will be tracked.
Purpose:	To provide a formal report of an issue so that it can be recorded and tracked.
Template or Standards:	PMO Issue Log
Location:	HHSC HIPAA Project Website; TDH HIPAA Project Work Breakdown Structure document

ID:	13
Communication Item:	High-level Data Crosswalk (Transactions Standards)
Description:	At the core of the HIPAA project is the mapping of the new HIPAA compliant data elements to current MMIS (Medicaid Management Information System) data elements. The template provides a spreadsheet, "fill-in-the-blank" format.
Purpose:	This high-level crosswalk document will provide the interagency workgroups with a template to record the groups' understanding and definition for how MMIS data entities map to HIPAA entities.
Template or Standards:	High-level Crosswalk Template
Location:	HHSC HIPAA Project Website

D:	14
Communication Item:	HIPAA Presentation Handouts
Description:	Handouts document oral presentations and executive briefings and provide clear, summarized information about project issues.
Purpose:	Share information with stakeholders who were not present at the presentation or briefing.
Template or Standards:	PowerPoint Presentation
Location:	HHSC HIPAA Project Website; TDH Online – HIPAA Project Website



## 5. Communication Matrix

ID	Communication Item	Audience	Frequency	Media	Created By
1	Meeting Agenda	Meeting distribution list	One work day prior to meeting	Document Emailed	Meeting Scribe
2	Meeting Minutes	Meeting distribution list	Two work days following the meeting	Document Emailed	Meeting Scribe
3	Bi-Weekly Status Reports	PMO and TDH management	Weekly	Document Emailed	Business Area Project Managers
4	PMO Project Monthly Updates	All interested parties (primarily external stakeholders)	Monthly	Document (published on project website)	PMO Project Manager/Staff
5	HHSC Executive Steering Committee Agenda	Meeting distribution list	Quarterly and as needed; agenda distributed two working days prior to meeting	Document	Meeting Scribe
6	HHSC Executive Steering Committee Minutes	Meeting distribution list	Quarterly and as needed; minutes distributed three working days after meeting	Document	Meeting Scribe
7	APD and Approval Letter	HCFA	COMPLETED	Document	HHSC PMO
8	Project Charter <ul style="list-style-type: none"> <li>• HHSC</li> <li>• TDH</li> </ul>	Senior Management	COMPLETED (Both)	Document	<ul style="list-style-type: none"> <li>• HHSC PMO</li> <li>• TDH PMO</li> </ul>
9	Project Management Plan <ul style="list-style-type: none"> <li>• HHSC</li> <li>• TDH</li> </ul>	Project stakeholders	Updated as-needed	MS Project	PMO, Business Area Project Managers
10	Project Development Plan	Project stakeholders	Updated as-needed	MS Project	PMO, Business Area Project Managers
11	Work Breakdown Structure <ul style="list-style-type: none"> <li>• High level cross walk</li> </ul>	Project Stakeholders	Updated as needed	MS Project	PMO, Business Area Project Managers
12	HIPAA Issue Tracking Log	HIPAA Project Manager, person assigned to the issue, other interested parties	Items are added as created, document is shared at the first of every month	Document	PMO with input from project stakeholders
13	Presentation Handouts	Interested parties	The week or so following the presentation	PowerPoint Document	Presentation owner – usually the HIPAA Project Manager or Business Area Managers